

EXHIBIT B

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FILED

JAN 12 2022

James J. DeLuca, J.S.C.

HUAXINTONG INTERNATIONAL
INVESTMENT MANAGEMENT LIMITED
and NEW ASIA (CHINA)
INTERNATIONAL GROUP COMPANY
LIMITED

Plaintiffs,

v.

HONGKUN USA INVESTMENT LLC,
1419 WK OWNER LLC, HK RR (NJ) LLC,
and 339 RIVER ROAD HOLDINGS LLC

Defendants,

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION:
BERGEN COUNTY

Docket No. C-306-21

CIVIL ACTION

ORDER TO SHOW CAUSE

SUMMARY ACTION

This matter being brought before to the court by Ali Kim, Esq., attorney for plaintiffs,
New Asia (China) International Group Company Limited and Huaxintong International
Investment Management Limited, seeking relief by way of summary action pursuant to R. 4:67-
1(a) and N.J.S.A. 2A:23B-5, and seeking relief by way of preliminary injunction at the return
date set forth below pursuant to R. 4:52 and N.J.S.A. 2A:23B-8, based upon the facts set forth in
the verified complaint filed herewith; and the court having determined that this matter may be
commenced by order to show cause as a summary action pursuant to N.J.S.A. 2A:23B-5 and
2A:23B-8 and for good cause shown,

January

It is on this 12 day of _____, 2022, ORDERED that defendants Hongkun USA Investment LLC, 1419 WK Owner LLC, 339 River Road Holding LLC, and HK RR (NJ) LLC, appear and show cause, on the 23 day of February, 2022, before the Superior Court at the Hudson County Courthouse at 595 Newark Ave, Jersey City, NJ 07306, at 9:30 a.m. ~~and/or~~ or as soon as thereafter as counsel can be heard,

- a. why an order should not be issued enjoining and restraining Defendants, their directors, officers, managers, employees, representatives, agents, and anyone acting under their authority, direction or control, during the pendency of the arbitration proceedings in Hong Kong that are currently being administered by the Hong Kong International Arbitration Centre, styled as *New Asia (China) International Group v. Hongkun USA Investment LLC, et. al.*, Case No. HKIAC/A21239; *Huaxintong International Investment Management Limited v. Hongkun USA Investment LLC, et. al.*, Case No. HKIAC/A21240; and *Huaxintong International Investment Management Limited v. Hongkun USA Investment LLC, et. al.*, Case No. HKIAC/A21238, and upon completion of the arbitration proceedings until such time as this Court on application determines good cause exists to vacate the injunction, or until Plaintiffs voluntarily dismiss this action thereby dissolving any injunction, from selling, liquidating, transferring or otherwise disposing their interests (which, for the avoidance of doubt, includes any mortgage on real property), or transferring the proceeds of any disposition of their interests, in the following real properties:

i. 1400 Avenue at Port Imperial, Weehawken Township, Hudson County, NJ;

ii. 1900 Avenue at Port Imperial, Weehawken Township, Hudson County, NJ;

iii. 339 River Road, Bergen County, NJ; and

iv. 115-145 River Road, Bergen County, NJ;

B. why a final judgment should not be entered so enjoining and restraining Defendants;
and

C. granting such other relief as the court deems equitable and just.

And it is further ORDERED that: *See Supplemental provisions to order to show cause*

1. A copy of this order to show cause, verified complaint and all supporting affidavits or certifications submitted in support of this application be served upon the defendants within _____ days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

2. The plaintiffs must file with the court the proof of service of the pleadings on the defendants no later than three (3) days before the return date.

3. Defendants shall file and serve a written answer, an answering affidavit, or a motion returnable on the return date, to this order to show cause and the relief requested in the verified complaint and proof of service of the same by _____.

The answer, answering affidavit or a motion as the case may be, must be filed with the Clerk of the Superior Court in the county listed above and a copy of the papers must be sent directly to the chambers of Judge _____.

See supplemental provisions to order to show cause

4. The plaintiffs must file and serve any written reply to the defendant's order to show cause opposition by _____. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge _____.

5. If the defendants do not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiffs file a proof of service and a proposed form of order at least three days prior to the return date.

6. If the plaintiffs have not already done so, a proposed form of order addressing the relief sought on the return date must be submitted to the court no later than three (3) days before the return date.

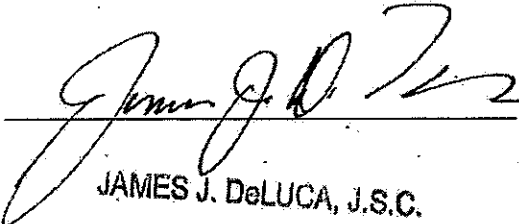
7. Defendants take notice that the plaintiffs have filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer, an answering affidavit, or a motion returnable on the return date, to the order to show cause and proof of service before the return date of the order to show cause.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at njcourts.gov/forms/10153_deptyclerklawref.pdf. Include a \$ _____ filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your answer, answering affidavit or motion to the plaintiffs' attorney, Ali Kim, Esq., Reid & Wise LLC, at One Penn Plaza, Suite 2015, New York, NY 10119. A telephone call will not

See supplemental provisions to order to show cause
protect your rights; you must file and serve your answer, answering affidavit, or motion with the fee, or judgment may be entered against you by default.

8. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at njcourts.gov/forms/10153_deptyclerklawref.pdf.

9. The Court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than _____ days before the return date.


JAMES J. DeLUCA, J.S.C.

CASE NAME: Huaxintong Int'l Inv. Mgmt. Ltd. v. Hongkun USA Inv. LLC
DOCKET NUMBER: C-306-21

SUPPLEMENTAL PROVISIONS TO ORDER TO SHOW CAUSE

RETURNABLE: February 23, 2022 at 9:30 a.m.

SERVICE OF PLEADINGS

A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application shall be served upon Defendant within 5 working days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4.

PROOF OF SERVICE

Plaintiff must file with the court his/her/its proof of service of the pleadings on Defendant no later than five (5) days before the return date.

DEFENDANT'S OSC/INJUNCTIVE RELIEF RESPONSE REQUIREMENTS

Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by February 9, 2022. Such response shall not exceed 15 pages in length. If these papers contain exhibits, the exhibits must be properly indexed using tabs that allow for easy access to each individual exhibit. The original documents must be filed with the Clerk of the Superior Court, Room 418. You must deliver a copy of your opposition papers directly to Judge James J. DeLuca, whose address is Room 424, Bergen County Courthouse, Hackensack, New Jersey. You must also send a copy of your opposition papers to Plaintiff's attorney whose name and address appears at the top of these papers, or to Plaintiff if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the Plaintiff is seeking. NOTE: These papers are not the Answer to Plaintiff's complaint, which must be filed within 35 days (see below).

PLAINTIFF'S REPLY RESPONSIBILITY

Plaintiff must file and serve any written reply to Defendant's order to show cause opposition by February 16, 2022. Such response shall not exceed 10 pages in length. If these papers contain exhibits, the exhibits must be properly indexed using tabs that allow for easy access to each individual exhibit. The reply papers must be filed with the Clerk of the Superior Court and a copy of the reply papers must be delivered directly to the chambers of Judge DeLuca.

OSC MAY PROCEED EX-PARTE

If Defendant does not file and serve opposition to this order to show cause, the application may be decided on the papers on the return date and relief may be granted by default, provided that Plaintiff files a proof of service and a proposed form of order at least five (5) days prior to the return day.

PREHEARING SUBMISSION FORM OF ORDER/JUDGMENT

If Defendant has not already done so, a proposed form of order addressing the relief sought on the return day (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than five (5) days before the return day.

NOTICE TO DEFENDANT - LAWSUIT ANSWER RESPONSIBILITY

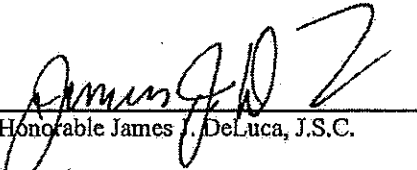
Defendant, take notice that Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the day of service of this order to show cause, not counting the day you received it. These documents must be filed with the Clerk of the Superior Court. Include the filing fee, payable to the "Treasurer, State of New Jersey." You must also send a copy of your Answer to Plaintiff's attorney whose name and address appear on these papers, or to Plaintiff if no attorney is named. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: If you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief Plaintiff demands.

LEGAL SERVICES NOTICE

If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

RETURN DAY TESTIMONY

The Court will entertain argument, but not testimony, on the return day of the order to show cause, unless the parties are advised to the contrary no later than 3 days before the return date.


Honorable James J. DeLuca, J.S.C.

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 345-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Case Processing Section, Room 119
Justice Center, 10 Main St.
Hackensack, NJ 07601-0769

LAWYER REFERRAL

(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862
LEGAL SERVICES
(609) 261-1088

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
1st Fl., Hall of Records
101 S. Fifth St.
Camden, NJ 08103

LAWYER REFERRAL

(856) 984-4520
LEGAL SERVICES
(856) 984-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Box DN-209
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Broad & Fayette Sts., P.O. Box 615
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 692-6207
LEGAL SERVICES
(856) 451-0003

ESSEX COUNTY:

Deputy Clerk of the Superior Court
50 West Market Street
Room 131
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6207
LEGAL SERVICES
(973) 624-4500

GLOUCESTER COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
Attn: Intake
First Fl., Court House
1 North Broad Street, P.O. Box 129
Woodbury, NJ 08096

LAWYER REFERRAL

(856) 848-4589
LEGAL SERVICES
(856) 848-5350

HUDSON COUNTY:

Deputy Clerk of the Superior Court
Superior Court, Civil Records Dept.
Brennan Court House— 1st Floor
583 Newark Ave.
Jersey City, NJ 07306

LAWYER REFERRAL

(201) 798-2727
LEGAL SERVICES
(201) 792-6363

HUNTERDON COUNTY:

Deputy Clerk of the Superior Court
Civil Division
65 Park Avenue
Flemington, NJ 08822

LAWYER REFERRAL

(908) 735-2611
LEGAL SERVICES
(908) 782-7979

MERCER COUNTY:

Deputy Clerk of the Superior Court
Local Filing Office, Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, NJ 08650

LAWYER REFERRAL

(609) 585-6200
LEGAL SERVICES
(609) 695-6249

MIDDLESEX COUNTY:
Deputy Clerk of the Superior Court
Administration Building
Third Floor
1 Kennedy Sq., P.O. Box 2633
New Brunswick, NJ 08903-2633

LAWYER REFERRAL
(732) 828-0053
LEGAL SERVICES
(732) 249-7600

MONMOUTH COUNTY:
Deputy Clerk of the Superior Court
Court House
71 Monument Park
P.O. Box 1269
Freehold, NJ 07728-1269

LAWYER REFERRAL
(732) 431-5544
LEGAL SERVICES
(732) 866-0020

MORRIS COUNTY:
Deputy Clerk of the Superior Court
Civil Division
30 Schuyler Pl., P.O. Box 910
Morristown, NJ 07960-0910

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 285-6911

OCEAN COUNTY:
Deputy Clerk of the Superior Court
Court House, Room 119
118 Washington Street
Toms River, NJ 08754

LAWYER REFERRAL
(732) 240-3665
LEGAL SERVICES
(732) 341-2727

PASSAIC COUNTY:
Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton St.
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 345-7171

SALEM COUNTY:
Deputy Clerk of the Superior Court
92 Market St., P.O. Box 18
Salem, NJ 08079

LAWYER REFERRAL
(856) 935-5628
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
New Court House, 3rd Fl.
P.O. Box 3000
Somerville, NJ 08876

LAWYER REFERRAL
(908) 685-2323
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:
Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:
Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:
Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 475-2010